

**RECEIVED**

MAR 16 2015

CLERK, U.S. DISTRICT COURT  
DISTRICT OF MONTANA  
HELENA**IN THE UNITED STATES DISTRICT COURT****FOR THE DISTRICT OF MONTANA**Helena**DIVISION**

(You must fill in this blank. See Instruction 7)

(Full name of Plaintiff and prisoner number, if any)

Peter Rothing Plaintiff,**COMPLAINT**vs. Steve Bullock, Mike Salvagni  
E. Wayne Phillips, Mike Menahan,  
Blair Jones, Victor Valgenti, Mike  
Manion, James Scheier, Amber  
Godbout,(Full name of each defendant as listed in the Parties  
section on page 5. Do not use et. al.)Jury Trial Demanded ☒Jury Trial Not Demanded ☐Defendants.**INSTRUCTIONS**

1. Use this form to file a civil complaint with the United States District Court for the District of Montana. Include only counts/causes of action and facts – not legal arguments or citations. You may attach additional pages where necessary. Your complaint must be typed or legibly handwritten in ink and on white paper. Write on only one side of the paper. Do not use highlighters and do not staple or otherwise bind your papers. All pleadings and other papers submitted for filing must be on 8 1/2" x 11" paper (letter size). You must sign the complaint (see page 8). Your signature need not be notarized but it must be an original and not a copy. The Clerk's Office cannot provide you copies of documents in your file without prepayment of \$0.10 per page (for documents electronically available) or \$0.50 (for documents not electronically available). Please keep a copy of the documents you send to the Court.
2. The filing fee for a complaint is \$350.00 plus a \$50.00 administrative fee for a total of \$400.00. This amount is set by Congress and cannot be changed by the Court. If you pay the filing fee, you will be responsible for serving the complaint on each defendant and any costs associated with such service.

Plaintiff's Last Name

Rothing

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3. If you are unable to prepay the entire filing fee and service costs for this action, you may file a motion to proceed in forma pauperis. If you are a prisoner and your motion to proceed in forma pauperis is granted, the Court will assess an initial partial filing fee equal to 20% of the average monthly deposits to your prison account for the six months immediately preceding the filing of the action, or 20% of the average monthly balance in your prison account for the same six month period, whichever is greater. Thereafter, the balance of the \$350.00 filing fee will be collected in installments equal to 20% of your preceding month's income any time the amount in your account exceeds \$10.00. The \$50.00 administrative fee does not apply to persons granted *in forma pauperis* status. You will be required to continue making these payments even if your complaint is dismissed.
4. Complaints submitted by persons proceeding in forma pauperis and complaints submitted by prisoners suing a governmental entity or employee must be reviewed by the Court before the defendants are required to answer. See 28 U.S.C. §§ 1915(e)(2), 1915A(a); 42 U.S.C. § 1997e(c). The Court will dismiss your complaint before it is served on the defendants if: (1) your allegation of poverty is untrue; (2) the action is frivolous or malicious; (3) your complaint does not state a claim upon which relief may be granted; or (4) you sue a defendant for money damages and that defendant is immune from liability for money damages. After the Court completes the review process, you will receive an Order explaining the findings and any further action you may or must take. The review process may take a few months; each case receives the judge's individual attention. Plaintiffs should not serve defendants, pursue discovery, or request entry of default judgment prior to the completion of this review process.
5. Prisoners who have had three or more cases dismissed as frivolous, malicious, or failing to state a claim upon which relief may be granted (strikes) will not be permitted to file any further civil actions without prepaying the filing fee unless they are in imminent danger of serious harm. See 28 U.S.C. § 1915(g).
6. Prisoners may not maintain more than two civil actions in forma pauperis at one time, unless the prisoner shows that he or she is under imminent danger of serious physical injury.
7. The case caption (page 1 of this form) must indicate the proper Division for filing. The proper Division is where the alleged wrong(s) occurred. When you have completed your complaint, mail the *original* of your complaint and either the full filing fee or your motion to proceed in forma pauperis to the proper Division:

**Billings Division:**     *Big Horn, Carbon, Carter, Custer, Dawson, Fallon, Garfield, Golden Valley, McCone, Musselshell, Park, Petroleum, Powder River, Prairie, Richland, Rosebud, Stillwater, Sweetgrass, Treasure, Wheatland, Wibaux, and Yellowstone Counties*

**U.S. District Court Clerk, James F. Battin Courthouse,  
2601 2nd Avenue North, Suite 1200, Billings, MT 59101**

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**Butte Division:** *Beaverhead, Deer Lodge, Gallatin, Madison, and Silver Bow Counties*  
**U.S. District Court Clerk, Mike Mansfield Courthouse, 400 N. Main,  
Butte, MT 59701**

**Great Falls Division:** *Blaine, Cascade, Chouteau, Daniels, Fergus, Glacier, Hill, Judith Basin,  
Liberty, Phillips, Pondera, Roosevelt, Sheridan, Teton, Toole, and Valley  
Counties (Crossroads Correctional Center is located in Toole County  
and all claims arising at CCC should be filed in Great Falls)*  
**U.S. District Court Clerk, Missouri River Courthouse, 125 Central Ave. West,  
Great Falls, MT 59404**

**Helena Division:** *Broadwater, Jefferson, Lewis & Clark, Meagher, and Powell Counties  
(Montana State Prison is located in Powell County and all claims  
arising at MSP should be filed in Helena)*  
**U.S. District Court Clerk, Paul G. Hatfield Courthouse, 901 Front St., Ste 2100,  
Helena, MT 59626**

**Missoula Division:** *Flathead, Granite, Lake, Lincoln, Mineral, Missoula, Ravalli, and Sanders  
Counties*  
**U.S. District Court Clerk, Russell Smith Courthouse, P.O. Box 8537,  
Missoula, MT 59807**

## **COMPLAINT**

### **I. PLACE OF CONFINEMENT**

A. Are you incarcerated? Yes ☐ No ☒ (if No, go to Part II)

B. If yes, where are you currently incarcerated?

C. If any of the incidents giving rise to your complaint occurred in a different facility, list that facility:

Plaintiff's Last Name Rothling

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## II. JURISDICTION

Jurisdiction is asserted under (CHECK ANY THAT APPLY):

\_\_\_\_ 28 U.S.C. § 1331 because it raises a civil rights claim against a state or local government employee or entity under 42 U.S.C. § 1983

\_\_\_\_ 28 U.S.C. § 1331 because it raises a claim against a federal employee under *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971)

\_\_\_\_ 28 U.S.C. § 1332 (diversity) because all the defendants live in a different state than plaintiff

If you wish to assert jurisdiction claim under different statutes, list them below.

## III. EXHAUSTION OF ADMINISTRATIVE REMEDIES

### A. Non-Prisoners

1. Does any cause of action alleged in this complaint require you to exhaust administrative remedies before filing in court? Yes ☐ No ☒ Don't Know ☐
2. If yes, have you exhausted your administrative remedies? Yes ☐ No ☐

### B. Prisoners (If other institutions listed in I(C) above, answer for each institution).

1. Did you fully exhaust the administrative grievance process within the jail or prison where the incidents at issue occurred? Yes ☐ No ☐
2. If you did not fully exhaust the grievance process, explain why:

(NOTE: Prisoners must exhaust their jail/prison's grievance process. Proper exhaustion requires compliance with the jail/prison's grievance deadlines and procedural rules.)

Plaintiff's Last Name Rothling

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IV. Parties to Current Lawsuit:

A. Plaintiff Peter Rothing of Montana, presently residing at 3040 Amsterdam Rd., Belgrade, MT 59714, who can be contacted at (406) 388-1760 by telephone or by e-mail: [diamondrroth@aol.com](mailto:diamondrroth@aol.com).

B Defendant Steve Bullock a citizen of Montana employed as Governor of Montana.

Defendant Mike Salvagni a citizen of Montana employed as District Court Judge, 18<sup>th</sup> Judicial District, Gallatin County.

Defendant E. Wayne Phillips a citizen of Montana employed as a substitute Judge (retired) of the 18<sup>th</sup> Judicial District, Gallatin County.

Defendant Mike Menahan a citizen of Montana employed as District Court Judge 1<sup>st</sup> Judicial District, Lewis and Clark County and as a member of the Montana Judicial Standards Commission.

Defendant Blair Jones a citizen of Montana employed as Judge and Chairman of the Montana Judicial Standards Commission.

Defendant Victor Valgenti a citizen of Montana employed as an attorney and as a member of the Judicial Standards Commission.

Defendant Mike Manion a citizen of Montana employed as Special Assistant Attorney General for the State of Montana.

Defendant James Scheier a citizen of Montana employed as an Assistant Attorney General for the State of Montana.

Defendant Amber Godbout a citizen of Montana employed as an Assistant Attorney General for the State of Montana.

Plaintiff's Last Name: Rothing

## STATEMENT OF CLAIMS

**A. Ongoing violations of my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights, with fraud and malice, in violation of the common law and the U.S. Constitution**

**1. Supporting Facts:**

Beginning in 2012 Gallatin County District Court Judges John Brown and Holly Brown dismissed 4 cases, without a trial by jury, and in violation of my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights. I appealed all 4 cases to the Montana Supreme Court and Chief Justice McGrath and Justices Wheat, Rice, Potter and Baker, alleging violations of my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights and they ruled, essentially, that those rights are not valid in the State of Montana, and supported the dismissal of all of my 4 cases.

I filed numerous complaints with the Judicial Standards Commission and with Chief Justice McGrath, personally, and in all cases my complaints were dismissed or ignored without any explanation and with no investigations done.

In 2014, I filed 2 lawsuits against the State of Montana and the 5 Supreme Court Justices as well as suits against District Court Judges Holly Brown and John Brown alleging, but not limited to, treason, conspiracy, official misconduct, obstruction of justice, personal injury, tort violations, fraud, malice and numerous violations under 18 USC and 42 USC. I also filed more complaints, for the record, with the Judicial Standards Commission, Attorney General Tim Fox and Governor Bullock alleging, but not limited to, official misconduct, obstruction of justice, personal injury, fraud, malice, tort violations, etc. and stating that, by their refusal to do their duty to their Oath of Office that they were becoming parties to the conspiracy and in violation of numerous sections under 18 USC and 42 USC.

Four of these cases, filed in 2014 in Gallatin County, were assigned to the 3 District Court Judges, now Brown, Salvagni, And Brown who refused to disqualify themselves as required under Rule 2.12 (A)(1) and its comment #2 of Montana's Code of Judicial Conduct.

They were being sued by me for their previous violations of my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights and were claiming their was no impropriety, bias, prejudice, or appearance of impropriety in them sitting on the cases filed against, among others, the 5 Supreme

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Court Justices, including McGrath, that were being sued by me for their actions in, unlawfully, supporting the District Court Judges' violations of my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights. In an effort to keep this alleged conspiracy in their courts, Chief Justice McGrath issued, without jurisdiction, several orders declaring that the District Court Judges did NOT have to disqualify themselves.

We wrangled back and forth for months with me alleging that their failure to disqualify was official misconduct, obstruction of justice, fraud, malice, tort violations, treason, conspiracy, etc. and that is was adding more personal injury. I also alleged, throughout this process, that none of them had jurisdiction in these case because, by their acts of treason, conspiracy and issuing orders, without jurisdiction, etc. they were bound, automatically, to forfeit their offices. Then on January 23, 2015 all 3 Judges Brown, Salvagni, and Brown acquiesced to my allegations of their wrongdoings, as cited above, and disqualified themselves. Along with their acquiescence Chief Justice McGrath, without jurisdiction, issued 8 unlawful orders to assign all 8 cases; the 4 here, as well as the 4 that were being defended by the State, to substitute retired Judge E. Wayne Phillips.

I immediately challenged the jurisdiction of McGrath to make that appointment because of all the reasons cited above. My challenge to his jurisdiction was never even addressed, much less proved. I challenged Judge Phillips' jurisdiction in proceeding without proving that he had been lawfully appointed. I challenged that a Chief Justice cannot appoint a judge to a case where the Chief Justice is a defendant and that to do so would give the appearance of impropriety to any "reasonable" mind. I also alleged that Judge Phillips was chosen as a "hit man" to cover up the alleged conspiracy. I was right.

On March 6, 2015, without proving jurisdiction, without a trial or even a hearing, Judge Phillips, in violation of my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights, dismissed all 8 cases. No judge has immunity when violating the Constitution because he has no jurisdiction to do so and that is clearly confirmed by Article 6, paragraph 2 of the Constitution. When Phillips, unlawfully, dismissed everything he made himself a co-conspirator and, thus, guilty of treason, conspiracy and multiple violations under 18 USC and 42 USC and his conduct, done with fraud and malice, added to the already

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significant and irreparable personal injury being inflicted upon me and upon my family, for years, in this ongoing travesty of justice.

In the other 4 cases unlawfully dismissed by Phillips, without jurisdiction, the State had assumed the vicarious liability of defending the State in DV-14-507C with Assistant Attorney General, Amber Godbout as attorney; in DV-14-529A, with Assistant Attorney General James Scheier as attorney, representing the State and the 5 Supreme Court Justices, McGrath, Wheat, Rice, Potter, and Baker. Special Assistant Attorney General Mike Manion was defending Judge Holly Brown and Judge John Brown in cause no. DV-14-925B and DV-14-926C respectively.

The most significant fact of these 4 cases is the FACT that in November of 2014, Attorney James Scheier, defending the Supreme Court Justices, by failing to participate in the case, whatsoever, gave tacit procuration to all of my claims, allegations and assertions made from that point on, and by that default, admitted that, among other things, his clients had lost jurisdiction, by failing to contest my assertions and that they were guilty of, but not limited to, treason and conspiracy, etc.

Once the Supreme Court Justices, in DV-14-529A, defaulted and, by tacit procuration, admitted to the conspiracy, that admission of guilt rendered the other co-conspirators' professions of innocence unsustainable and thus admissions of guilt, too.

When Manion and Godbout continued their defense, despite the admissions of guilt by default, they became accessories after the fact for trying to still cover up the conspiracy and thus became co-conspirators themselves.

Prior to Phillips, unlawful rulings, I can document in the written record my assertions made to Governor Bullock alleging, but not limited to, that by law, it is his duty, as Governor, to appoint and maintain an honest and ethical judiciary for me and all the People of Montana and that his failure to do so, when he was made aware of the problem, was a violation of his Oath of Office and also, made him a party to the conspiracy.

Also, prior to Phillips unlawful rulings, in my lengthy correspondence with the Montana Judicial Standards Commission, I alleged and asserted that their failure to do their duty in response to my complaints was a violation of their Oaths of Office and also made them co-conspirators.

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The Constitution is an ironclad contract that cannot be subverted by the judiciary under any circumstances. We the People ordained and established the Constitution for the purpose of controlling government officials, including the judiciary. We agree to be governed solely under the terms of the Constitution, and the agents of the government, including the judiciary, agree to govern solely within the jurisdiction of the powers granted to them in the Constitution, and they receive compensation for fulfilling their duties within the bounds of the Constitution.

The Bill of Rights, also known as the Bill of Prohibitions, clearly states in the 1<sup>st</sup> amendment that the government cannot, under any circumstances, deprive me of the right to petition the government when the government's actions cause grievances. That is why it is called a RIGHT instead of a PRIVILEGE.

The 5<sup>th</sup> amendment Right guarantees Due Process of law which is guaranteed in the absolute right to have a jury, not a judge, be the trier of both the facts and the law. That is why jury nullification is consistent with the common law and the Constitution.

Throughout this whole long travesty of justice I have been agreeable to bringing my grievances to the courts under the terms of the 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendments to the Constitution and any statutes NOT repugnant to the Constitution including, but not limited to, the Rules of Civil Procedure regarding motions, etc. that fall within the parameters of NOT being repugnant to the Constitution.

Dismissal for "Failure to State a Claim" is repugnant to the Constitution because it pre-judges facts and law that, under the Constitution, it is the sole prerogative of a jury to decide.

Every person involved in this travesty of justice who has previously sworn the Oath of Office is equally guilty of treason to the Constitution and because there are 2 or more makes it a conspiracy.

Does this court believe that out of all of these judges, justices, high-powered attorneys and members of the Judicial Standards Commission, NOT ONE knows the law, and the limits of the law, as ordained and established in the U.S. Constitution?

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2. Defendants involved:

- 1) Judge Holly Brown: 1 count unconstitutional dismissal for failure to state a claim in violation of 1<sup>st</sup>, 5<sup>th</sup>, 7<sup>th</sup> amendments, 2 counts attempting to unlawfully usurp jurisdiction, accessory to conspiracy and accessory after the fact in covering up the conspiracy in numerous violations of 18 USC and 42 USC.
- 2) Governor Bullock: Breach of Contract, official misconduct and obstruction of justice through state sponsored terrorism for the political purpose of maintaining a corrupt judiciary by aiding in the conspiracy to perpetuate an organized system of depriving people of their 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights.
- 3) Judge John Brown: 3 counts unconstitutional dismissal for failure to state a claim in violation of 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendments, 4 counts of attempting to unlawfully usurp jurisdiction, accessory to conspiracy and accessory after the fact in covering up conspiracy in numerous violations of 18 USC and 42 USC.
- 4) Judge Mike Salvagni: 1 count unconstitutional dismissal, 2 counts attempting to unlawfully usurp jurisdiction, accessory to conspiracy and accessory after the fact in covering up conspiracy; numerous violations under 18 USC and 42 USC.
- 5) Chief Justice McGrath: 4 counts unlawful dismissal, 10 counts of issuing orders without jurisdiction, accessory to conspiracy and accessory after the fact in covering up conspiracy; numerous violations under 18 USC and 42 USC.
- 6) Justice Wheat: 4 counts unlawful dismissal, accessory to conspiracy and accessory after the fact in covering up conspiracy, numerous counts under 18 USC and 42 USC.
- 7) Justice Rice: 4 counts unlawful dismissal, accessory to conspiracy and accessory after the fact in covering up conspiracy, numerous counts under 18 USC and 42 USC.
- 8) Justice Potter: Same as Wheat and Rice.

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- 9) Justice Baker: Same as Wheat, Rice and Potter.
- 10) Judge Phillips: 8 counts unlawful dismissal, 8 counts issuing orders without jurisdiction, 1 count unconstitutional order, accessory to conspiracy, numerous counts under 18 USC and 42 USC.
- 11) Judge Menahan: numerous violations of oath, accessory to conspiracy, accessory after the fact in covering up conspiracy, numerous counts under 18 USC and 42 USC.
- 12) Judge Blair Jones: Same as Menahan.
- 13) Attorney Victor Valgenti: Same as Menahan and Jones.
- 14) Special Assistant Attorney General Mike Manion: Same as Menahan, Jones and Valgenti.
- 15) Assistant Attorney General James Scheier: Same as Manion.
- 16) Assistant Attorney General Amber Godbout: Same as Manion and Scheier.

All of the above, by their wanton, willful, and reckless actions did, with fraud and malice, inflict irreparable personal injury upon me and upon members of my family, including, but not limited to, exacerbating my stress induced depression to the point of making me suicidal.

## VI. INJURY

My injuries are cumulative, irreparable and still ongoing due to the efforts of all of these co-conspirators in prolonging this conspiracy to cover up their lawless and malicious actions by violating, continuously, my rights guaranteed by the 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendments to the Constitution.

When all of this started I was a happy, extremely healthy, man with a beautiful, Godly, wife, and 4 beautiful young children. The emotional stress caused me to develop severe depression which causes chemical changes in my brain and body which caused me to become diabetic which brought

6. Nothing

along with it high blood pressure and chronically lethal A1C levels and with all that came chronic fatigue, muscle weakness and atrophy, chronic headaches and joint pain and a weakened immune system. Those things prevent me from doing any amount of physical labor or exercise, which has caused several incidences of blood clots in my legs with puts me at a higher risk of heart attack and stroke. To prevent the heart attack and stroke I was told I would have to take the blood thinner, warfarin, for life, but then in 2013, with my compromised immune system, I got severe pneumonia that, because of all my other medications, would not respond to the normal antibiotics, so I had it for 8 weeks and I would have coughing fits so bad that I would, at times, black out and fall down. On one fall I hit my head so hard that it caused a bleed in my brain, because of the warfarin, which then caused a massive subdural hematoma that covered the entire left side of my brain and caused my brain to be pushed to the right past the midline which, when discovered, caused me to have to be life-flighted to Billings for emergency neurosurgery, wherein they had to drill 2 dime-sized holes in my skull to let the pressure out.

With severe brain trauma like that they say that a person should do as little as possible anything that requires brain work. When I got out of the hospital I was nearing the deadline for responding to parts of these lawsuits and was forced to spend hours writing briefs which then caused me to have a massive seizure which left me seizing on the bathroom floor for over 1 ½ hours because nobody was home at the time. That seizure caused me to have spasms in my arms and caused “expressive aphasia” where I could not talk or could not complete a sentence. The anti-seizure meds for that alone costs over \$400/mo. And to prevent recurring brain bleed they had to take me off the warfarin, which puts me back at an increased potential for blood clots, heart attack and stroke. I did get another blood clot in my leg last spring so they had to put me on warfarin again which then puts me back at risk for brain hemorrhaging so I have to stay on the expensive anti-seizure meds, possibly for life at \$400/month.

We lost our health care coverage because of all this and so just a month ago, when money got tight, I could not afford the expensive meds but when I went without, for just 3 days, my post-concussive symptoms immediately returned and now my neurologist, who I can no longer afford to see, tells me I will definitely have to be on the anti-seizure meds for life.

Naturally, all of this and the still ongoing stress have left me unable to enjoy the pleasures of life, both physically mentally, due to the complete loss of emotional tranquility. They have increased my anti-depressants meds from 10 mg/day to 40 mg/day and on really bad days I self-medicate up to

60 mg/day and I still feel like I need more to feel normal. I cannot sleep without sleeping pills and on bad days I cannot even sleep with the pills. The recurring loss of sleep at this stage exacerbates all of my other health issues, which has then caused me to lose relational consortium with my wife and parental consortium with my kids. Because of the ongoing stress I cannot regulate my diabetes by diet and exercise so now I am forced to take insulin at a cost of over \$400/month

I was an outfitter for years and an avid hunter and outdoorsman. Until 2 weeks ago I had not been on my horse for over 2 years and this last fall I missed out on being with my youngest son when he shot his first deer. I was there for each of my other 3 children's but one of my older sons had to take him because of my health issues.

I have missed out on years of my children's lives because the depression and stress-caused fatigue and other bodily ailments cause severe mood swings, which at times, have caused my wife and children to fear me and/or to fear that I will become suicidal. Last summer during a particularly bad period I did feel suicidal and I left home and was gone for 4 days and my family did not know where I was or when/if I was going to make it back alive.

Because of all of these health issues I can no longer be a productive member of my family and our businesses have suffered causing undue financial hardships which caused me to have to borrow large sums of money, at times, from my mother which has caused a great deal of strife amongst my 7 siblings. Only my oldest brother will even speak to me and that is because he has to, because my mother can no longer handle her own affairs and so he is the executor of her estate.

In some ways death would almost be preferable to the life I am forced to be living now! Damn right they have injured me and they are going to continue to do so as long as they possibly can in the hope that their injuries will kill me before I can find a judge with enough integrity to honor his Oath of Office and sustain my 1<sup>st</sup>, 5<sup>th</sup> and 7<sup>th</sup> amendment rights under the Constitution.

## VII. Request for Relief:

As the Court will see, I am filing this case against the alleged co-conspirators who are presently Not named defendants in the 8 pending cases just dismissed, unlawfully, by Judge Phillips because, by his orders being void, by law, those cases are still pending. However, I seek a writ of Mandamus from this court ordering Judge Phillips to disqualify himself, in

all 8 cases, and another judge appointed to empanel juries so that the cases can go forward, under the common law, as ordained and established in the Constitution for the United States of America. I will be pursuing criminal charges at a later date. Those cases when reinstated already have requests for relief.

I am seeking, in this case, relief in the form of monetary compensation from the State of Montana for the amount of 20 million dollars for the irreparable personal injury still being inflicted upon me and upon members of my family by agents of the State.

I am also seeking from the State 20 million dollars in tort damages for negligence, negligent and intentional infliction of emotional stress, constitutional tort, and breach of the implied covenant of good faith and fair dealing.

From those defendants named, personally, herein, I am seeking relief in the form of monetary compensation for personal injury damages in the amount of \$100,000.00 dollars per defendant, tort damages in the amount of \$50,000.00 dollars per defendant and punitive damages amounting to 3% of their net worth calculated prior to the payment of personal injury and tort damages or in the alternative, resignation from office after a public allocution of their guilt and confession to their part in the conspiracy with the others.

I reserve the right to pursue criminal charges at a later date.

ALL RIGHTS RESERVED.

  
Peter Rothing

9. Rothing



### VIII. PLAINTIFF'S DECLARATION

- A. I understand I must keep the Court informed of my current mailing address and my failure to do so may result in dismissal of this Complaint without notice to me.
- B. I understand the Federal Rules of Civil Procedure prohibit litigants filing civil complaints from using certain information in documents submitted to the Court. In order to comply with these rules, I understand that:
- social security numbers, taxpayer identification numbers, and financial account numbers must include only the last four digits (e.g. xxx-xx-5271, xx-xxx5271, xxxxxxxx3567);
  - birth dates must include the year of birth only (e.g. xx/xx/2001); and
  - names of persons under the age of 18 must include initials only (e.g. L.K.).

If my documents (including exhibits) contain any of the above listed information, I understand it is my responsibility to black that information out before sending those documents to the Court.

I understand I am responsible for protecting the privacy of this information.

- C. I understand the submission of a false statement or answer to any question in this complaint may subject me to penalties for perjury. I declare under penalty of perjury that I am the Plaintiff in this action, I have read this complaint, and the information I set forth herein is true and correct. 28 U.S.C. § 1746; 18 U.S.C. § 1621.
- D. (Prisoners Only) This Complaint was deposited in the prison system for legal mail, postage prepaid or paid by the prison, on

Executed at \_\_\_\_\_ on \_\_\_\_\_, 20\_\_\_\_.  
(Location) (Date)

  
Signature of Plaintiff

Plaintiff's Last Name Rothing

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